



May 29, 2012

Tom Tidwell, Chief  
USDA Forest Service  
Ecosystem Management Coordination  
1400 Independence Ave., SW  
Mailstop Code 1104  
Washington, DC 20250-1104

RE: Notice of Appeal – Huron-Manistee National Forests Record of Decision signed on January 27, 2012 by Regional Forester Charles L. Myers for the Final Supplemental Environmental Impact Statement for the 2006 Land and Resource Management Plan

Dear Chief Tidwell:

This Notice of Appeal is filed on behalf of Michigan United Conservation Clubs (MUCC), 2101 Wood Street, Lansing, Michigan 48912 (phone 517-346-6475) regarding the Huron-Manistee National Forests Record of Decision (ROD) which was signed on January 27, 2012 by Regional Forester Charles L. Myers for the Final Supplemental Environmental Impact Statement (FSEIS) for the 2006 Huron-Manistee National Forest Land and Resource Management Plan. MUCC is filing this Notice of Appeal in accordance with optional appeal procedures available during the Planning Rule transition period, as outlined in Section 3.

It is MUCC's position that Regional Forester Myers erred when he picked Alternative 4 as the Selected Alternative for this ROD. We believe the correct choice should be Alternative 3.

As the ROD acknowledges, even after 25 years of designation, the Semiprimitive Nonmotorized Areas (SPNM) fail to meet the Recreation Opportunity Spectrum (ROS) characteristics and there are few things the Huron-Manistee National Forest can do under its current authority to bring them to conformity. MUCC believes that reclassifying the areas in question was necessary as outlined in the ROD, but we disagree with the designation of 8.4 "Special Areas" given to 11 areas under Alternative 4.

Changing the designation of the more than 46,000 acres to "Special Areas" does not resolve the inconsistencies with the ROS characteristics. Table A-4 in the ROD shows the Management Areas 8.4 that were re-designated from Management Area 6.1 to Management Area 8.4 as a result of Amendment 1 to the 2006 Forest Plan. Each of these areas in question indicates they will be managed to an ROS of Roaded Natural or Semiprimitive Motorized, which would be a more fitting classification. The direction of providing a "more secluded and less roaded

recreational experience” is not well defined within the plan or the ROD and will still be subject to significant interpretation and debate.

At the same time, we believe that the ROD statement (page 19) that Alternative 3 does not address “Significant Issue 2<sup>1</sup>” brought forward in public comment is also incorrect. The Huron-Manistee currently provides for ample quiet recreation experiences during most times of the year, to the extent that management of noise sources is under the USFS control. As indicated, the majority of gun hunting with these areas occurs during Michigan’s two-week gun hunting season in late November; which “is not typically a time when many quiet recreation activities occur such as bird watching or winter sports, because migratory birds do not remain in Northern Michigan into late November and there is typically insufficient snowpack for cross-country skiing or snowshoeing.”

Alternative 4 is not superior to Alternative 3 in addressing Significant Issue 2 under the aforementioned 8.4 Special Area designations, as firearm hunting and snowmobiling will still be allowed to continue and there will still be the sources of noise from the following places within and outside of the Special Areas:

- Private lands
- Military training runs and firing ranges
- Railroads and State Highways
- County roads, which allow ORV and snowmobile use on most road shoulders.
- Active oil/gas well sites and pipelines
- Utility lines
- National Forest Service Recreation Sites
- Nearby snowmobile trails

The 42,000 sportsmen and women of MUCC respectfully appeal the decision to adopt Alternative 4 in the Final Supplemental Environmental Impact Statement. We believe Alternative 3 much more clearly defines the intent of management and desired future conditions.

Respectfully submitted,

Amy Trotter  
Resource Policy Manager  
517-346-6484 or [atrotter@mucc.org](mailto:atrotter@mucc.org)

Cc: Charles L. Myers, Regional Forester and Deciding Officer

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<sup>1</sup> “The Huron-Manistee National Forests should provide opportunities for quiet recreation experiences”